

**UNITED STATES DISTRICT COURT**

MIDDLE DISTRICT OF ALABAMA  
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February 7, 2007

**NOTICE OF CORRECTION**

**From:** Clerk's Office

**Case Style:** Alonzo Austin v. Global Connection

**Case Number:** #3:07-cv-00042-MEF

**Referenced Document:** Document #4  
Answer

**This notice has been docketed to enter the certificate of service into the record. The original pdf did not contain a certificate of service. The corrected pdf is attached to this notice.**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

ALONZO AUSTIN,	)	
	)	Case Number:
Plaintiff	)	
	)	3:07-CV-042-MEF
v.	)	
	)	
GLOBAL CONNECTION,	)	
	)	
Defendant	)	

**ANSWER AND DEFENSES OF DEFENDANT GLOBAL CONNECTION**

COMES NOW Defendant Global Connection and files this its Answer and shows as follows:

**FIRST DEFENSE**

Plaintiff has failed to state a claim for which relief may be granted.

**SECOND DEFENSE**

Plaintiff has accepted payment for his alleged damages from the Defendant reaching an accord and satisfaction with regard to the claims of his Complaint.

1.

Defendant admits this Court has jurisdiction over the claims alleged in Plaintiff's Complaint. To the extent the first unenumerated paragraph of Plaintiff's Complaint contains allegations other than claiming this Court has subject matter jurisdiction over this matter, such claims are expressly denied.

2.

Defendant is without sufficient knowledge to admit or deny the allegations contained in the first enumerated paragraph of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

3.

Defendants admit the allegations contained in Paragraph 2 of Plaintiff's Complaint.

4.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 3 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

5.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 4 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

6.

Defendant denies the allegations contained in Paragraph 5 of Plaintiff's Complaint.

7.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 6 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

8.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 7 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

9.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 8 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

10.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 9 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

11.

Defendant is without sufficient knowledge to admit or deny the allegations contained in Paragraph 10 of Plaintiff's Complaint. To the extent a response is required to said allegations, they are expressly denied.

#### **COUNT ONE**

Defendant denies the allegations contained in Count One of Plaintiff's Complaint and reincorporates its responses to Paragraphs 1 through 4 of Plaintiff's Complaint as set out in Paragraphs 2 through 5 of Defendant's Answer.

#### **COUNT TWO**

Defendant denies the allegations contained in Count Two of Plaintiff's Complaint and reincorporates its responses to Paragraphs 1 through 9 of Plaintiff's Complaint as set out in Paragraphs 2 through 10 of Defendant's Answer.

**COUNT THREE**

Defendant denies the allegations contained in Count Three of Plaintiff's Complaint and reincorporates its responses to Paragraphs 1 through 10 of Plaintiff's Complaint as set out in Paragraphs 2 through 11 of Defendant's Answer.

WHEREFORE, premises considered, the Defendants pray for the following relief:

- (a) That an Order issue denying all of Plaintiff's claims;
- (b) That all costs of this action be taxed to the Plaintiff; and
- (c) Such other and further relief as this Court deems just and equitable under the circumstances.

This 7<sup>th</sup> day of February, 2007.

MCKOON, THOMAS & MCKOON

*/s/Joshua R. McKoon*

By: \_\_\_\_\_

Joshua R. McKoon  
State Bar No. MCK057

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334.297.2300  
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Counsel for Defendant

**CERTIFICATE OF SERVICE**

Counsel for the Defendant has this day served the foregoing Answer on the Plaintiff via First Class Mail at the following address:

Alonzo Austin  
1321 Oliver Carus Road  
Tuskegee, Alabama 36083

This 7th day of February, 2007.

*/s/Joshua R. McKoon*

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Counsel for Defendant